

1 E. VERSCHLEISER

2 MR. FRYDMAN: I just want to  
3 close the loop again.

4 THE WITNESS: I didn't ask to  
5 create a setting.

6 Q. I'm talking about the  
7 following: Creating a setting on an  
8 internet search engine, I'm sorry, an  
9 e-mail exchange server, a manager for  
10 organizational unit on an e-mail exchange  
11 server, a backup on an e-mail exchange  
12 server, a my services log-in to Outlook on  
13 an e-mail exchange server, an e-mail  
14 archiving function on an e-mail exchange  
15 server, a mailbox PST file on an e-mail  
16 exchange server, or a proxy address on an  
17 e-mail exchange server. As to any of  
18 those, did you at time since December 3,  
19 2013, ask, instruct, or direct any other  
20 person to create, modify, delete, copy, or  
21 change any of those?

22 MR. COOPER: Objection to form.

23 A. You need to go through those  
24 individually because there were too many  
25 terminologies that I really don't --

1 E. VERSCHLEISER

2 Q. Okay, well, then we'll do that.

3 A. Okay.

4 Q. Did you --

5 THE WITNESS: Are we going to  
6 go over this?

7 Q. Did you, since December 3,  
8 2013, ask or direct any person to create,  
9 modify, delete, or change any settings on  
10 the United Realty e-mail exchange server?

11 A. It's the same answer as I gave  
12 before.

13 Q. Did you, since December 3,  
14 2013, ever ask, instruct, or direct any  
15 other person to create, modify, change,  
16 delete, or disable any manager for an  
17 organizational United Realty on the United  
18 Realty e-mail exchange server?

19 A. Any question that you ask  
20 related to an exchange server, if it's  
21 other than the fact that it sends and  
22 receives e-mails, and, I guess, stores  
23 them, I do not understand the terminology  
24 or the functions pertaining to that  
25 exchange server, so any of these

1 E. VERSCHLEISER

2 terminologies that you're going to ask me  
3 questions will be -- the answer will be  
4 answered the same. If you'd like to  
5 continue to do this for another half hour,  
6 my attorney thinks it's appropriate, we  
7 could continue doing that.

8 MR. COOPER: I think you have  
9 your answer. You want to move on.

10 Q. Is it then fair to say, with  
11 respect to all these things, you don't know  
12 what they are? That you also didn't ask  
13 somebody else to do them for you?

14 A. If I don't know what they  
15 are --

16 MR. COOPER: Objection to form.

17 A. -- then how can I ask somebody  
18 else to do them for me?

19 Q. So, would you please tell me  
20 whether or not whether you did or did not.  
21 Did you or did you not ask someone else to  
22 do those things?

23 MR. COOPER: He said he can't  
24 answer the question. It's perfectly  
25 appropriate because he doesn't know

1 E. VERSCHLEISER

2 what he's asking somebody to do.

3 We've been over this repeatedly.

4 MR. FRYDMAN: Okay. We're  
5 ready for a five-minute break with  
6 the videographer.

7 THE VIDEOGRAPHER: We are now  
8 off the record at 3:56 p.m.

9 (Whereupon, a short recess was  
10 taken.)

11 (Ms. Volpe and Mr. Edelman did  
12 not return from the break.)

13 THE VIDEOGRAPHER: This is Tape  
14 3. We are now on the record at 4:06  
15 p.m.

16 Q. Mr. Verschleiser, do you know  
17 Jerry Elfassy?

18 A. Not to my recollection.

19 MR. COOPER: How do you spell  
20 the last name?

21 MR. FRYDMAN: E-L-F-A-S-S-Y.

22 MR. COOPER: Thank you.

23 Q. At any time since December 3,  
24 2013, did you ask any of the following  
25 people to access the United Realty e-mail

1 E. VERSCHLEISER

2 exchange server on your behalf: Raul Del  
3 Forno?

4 A. Access -- and I don't know  
5 other than an e-mail exchange server sends  
6 and receives e-mails.

7 Q. So the answer is no?

8 MR. COOPER: Objection to form.

9 A. That's my answer pertaining to  
10 anything related to an e-mail exchange  
11 server.

12 Q. So did you instruct or ask Raul  
13 Del Forno to access the e-mail exchange  
14 server, whatever it does, on your behalf?

15 MR. COOPER: Objection to form.

16 Asked and answered.

17 A. I don't know anything other  
18 than an e-mail exchange server sends and  
19 receives e-mail. I don't understand  
20 accessing it. I don't understand anything  
21 other than that.

22 Q. Okay. Did you ask any of the  
23 following people to log in on your behalf  
24 into the United Realty e-mail exchange  
25 server: Raul Del Forno?

1 E. VERSCHLEISER

2 A. It's the same answer as before.

3 MR. COOPER: It will probably  
4 be easier to say, "I don't know," you  
5 know --

6 THE WITNESS: As regards to the  
7 whole statement?

8 MR. COOPER: All right, say  
9 what you're saying.

10 A. I don't know other than an  
11 e-mail exchange server sends and receives  
12 e-mails. I don't know anything --

13 Q. That's unresponsive to my  
14 question. The question is not what it  
15 does, my question is, did you ask Mr. Del  
16 Forno to log in on your behalf into the  
17 United Realty e-mail exchange server?

18 MR. COOPER: I think the  
19 fundamental problem is you're asking  
20 him whether he knowingly did that. I  
21 think he's telling you that he  
22 doesn't know what these things are.

23 MR. FRYDMAN: That's fair,  
24 Steve.

25 Q. Did you knowingly ask Mr. Del

1 E. VERSCHLEISER

2 Forno to log in on your behalf into the  
3 United Realty e-mail exchange server after  
4 December 3, 2013?

5 A. No, I did not.

6 Q. Did you knowingly ask any of  
7 the following people to access, log in to  
8 the United Realty e-mail exchange server  
9 after December 13, 2013 --

10 A. You just need to explain what  
11 logging into the exchange server means.

12 Q. Signing in to access the  
13 administrative area of, of what I refer to  
14 as Host Pilot and you say you don't know  
15 what it is.

16 You know, what it might be  
17 easier, you have a number of domains on  
18 Intermedia; isn't that right?

19 MR. COOPER: Observation.

20 Q. You have a Multi Groups domain;  
21 is that correct?

22 A. I don't know. I have to look.

23 Q. You testified that you did.

24 MR. COOPER: Objection to form.

25 A. Oh, did I?

1 E. VERSCHLEISER

2 Q. Your testimony earlier is that  
3 you did.

4 A. If we find that and we find  
5 that's the case, could we stop the  
6 testimony today?

7 Q. Your testimony was --

8 MR. COOPER: Just ask him a  
9 question. That's the easiest thing.  
10 Don't tell him what his testimony,  
11 was, just ask him a question.

12 Q. Do you, Eli Verschleiser, have  
13 administrative rights or ownership rights  
14 on any e-mail exchange server?

15 MR. COOPER: Objection to form.

16 A. I do not know.

17 Q. You do not know if you do?

18 A. That's correct.

19 MR. COOPER: Asked and  
20 answered.

21 Q. Since you don't know, if you do  
22 have administrative rights on, or ownership  
23 rights on any e-mail exchange server, have  
24 you ever used those administrative rights  
25 or those ownership rights?



1 E. VERSCHLEISER

2 MR. COOPER: Objection to form.

3 That's unanswerable. It's a  
4 hypothetical and it's unanswerable.

5 A. Please refer to the last  
6 answer, as it's the same.

7 Q. I'm terribly sorry because it's  
8 probably my fault because I am  
9 technologically, you know, not as  
10 sophisticated as I wish I were, but let me  
11 try it.

12 A. Neither am I. You're asking me  
13 questions that you probably don't  
14 understand and I'm answering you that I  
15 don't understand, so we're going to spend  
16 hours going through this and I'm going to  
17 keep on referring to my last question.

18 Q. Let me try it this way.

19 (Whereupon, Ms. Volpe returned  
20 to the deposition at 4:12.)

21 Q. That when I say access as an  
22 administrator and owner, that means log in  
23 to that special part of an e-mail exchange  
24 server where an administrator or an owner  
25 has rights to do things that standard

1 E. VERSCHLEISER

2 mailbox users don't; can we accept that  
3 definition?

4 MR. COOPER: Objection to form.

5 A. I will not accept any  
6 definition of something that you're  
7 defining.

8 Q. Have you accessed any e-mail  
9 exchange server as an administrator or  
10 owner?

11 A. Please refer to my answer as I  
12 don't know anything other than an exchange  
13 server sends and receives e-mails.

14 Q. Okay. We'll make this much  
15 easier now, something you know about. You  
16 know about e-mail mail boxes, right? You  
17 know you have some, right?

18 A. I have an e-mail mailbox and in  
19 my Outlook software, which -- yes, that's  
20 my definition of it.

21 Q. Gives you the ability of --

22 A. To read e-mails.

23 Q. -- of writing and receiving and  
24 sending e-mails, correct?

25 A. I'm not going to define it, but

1 E. VERSCHLEISER

2 I know that I read e-mails in my Outlook  
3 software.

4 Q. Okay, how do you access your  
5 Outlook software?

6 A. I turn it on.

7 Q. Do you have a password?

8 A. I don't know.

9 Q. You don't know if you have a  
10 password. Do you have to log on to  
11 Outlook?

12 A. No, I do not.

13 Q. So anybody can go on your  
14 computer and log in to your e-mail account  
15 without a password?

16 A. Correct.

17 Q. Have you ever gone into my  
18 e-mail account, Jacob.F@URPA.com without  
19 authorization?

20 MR. COOPER: Objection to form.  
21 What's the e-mail address, Jacob?

22 MR. FRYDMAN: Dot F at  
23 URPA.com.

24 A. Many, many times.

25 Q. Okay. Did you ever do -- when

1 E. VERSCHLEISER

2 did you do that?

3 A. As long as I have ownership in  
4 a company that I -- I have the rights to  
5 look at anyone's e-mails in that company.

6 Q. Okay. After you no longer had  
7 ownership in the company, did you continue  
8 to do that?

9 A. After I had --

10 MR. COOPER: Objection to form.

11 A. -- had no longer ownership in  
12 what company?

13 Q. United Realty Advisors LP.

14 A. I have ownership in the  
15 company.

16 Q. Really. I'd like you to  
17 explain that to me.

18 A. I don't think it's relevant to  
19 this.

20 Q. Are you --

21 A. Well, we'll discuss it in  
22 our --

23 Q. Excuse me, is it your testimony  
24 that as we sit here today, you are an owner  
25 of United Realty Advisors LP?

1 E. VERSCHLEISER

2 A. You have to define what an  
3 "owner" is in your words.

4 Q. Well, do you have any equity  
5 membership interests of any nature  
6 whatsoever?

7 A. I believe so.

8 Q. What do you have?

9 A. I'm going to have to ask my  
10 attorneys to define it.

11 Q. Well, I'm asking you what you  
12 have.

13 A. I believe I own half of the  
14 company.

15 Q. You do. You didn't sell that  
16 to anybody?

17 A. I still -- I believe that I  
18 still have --

19 To answer that question  
20 specifically, I and my affiliates invested  
21 all the money to the tune of between 10 and  
22 15 million dollars to bring United Realty  
23 Advisors and its affiliates to where it is  
24 and you put no money in.

25 I, at some point in time in

1 E. VERSCHLEISER

2 December, decided that I did not want to  
3 sit in a company that has fraudulent  
4 activities being done by its CEO and be  
5 involved any further. I since have  
6 resigned from the company and still have my  
7 economic interest in the company as I  
8 always had. That's my testimony.

9 Q. So your testimony under oath is  
10 that you own the same thing today that you  
11 owned on December 3, 2013?

12 MR. COOPER: Objection to form.

13 Q. Is that right?

14 A. You can read back my last  
15 answer. That's my testimony.

16 Q. No, I'm asking you. Do you own  
17 today --

18 MR. COOPER: What does this  
19 have to do with the defamation?

20 MR. FRYDMAN: Well, he's --  
21 he's answering things that are  
22 clearly, in my view, incorrect and  
23 completely --

24 THE WITNESS: Well, in our  
25 lawsuit against you, your view will

1 E. VERSCHLEISER

2 be determined.

3 MR. COOPER: Wait, wait, wait.

4 Stop, stop, stop.

5 Q. Let me ask you this: Did you  
6 assign a hundred percent of the membership  
7 interest that your affiliates owned --

8 A. No.

9 Q. -- in United Realty Advisors to  
10 one of my affiliates on December 3rd or  
11 4th, 2013?

12 MR. COOPER: Okay. We're not  
13 going down this road. This is the  
14 other lawsuit. The judge has been  
15 clear --

16 MR. FRYDMAN: I'm just -- Im  
17 just --

18 MR. COOPER: The judge is  
19 crystal clear.

20 MR. FRYDMAN: This is this  
21 response to his last statement, which  
22 is blatantly incorrect and which is  
23 completely -- completely negated by  
24 the documentary evidence, okay, so --  
25 so --

1 E. VERSCHLEISER

2 But you know what, I shouldn't  
3 really be surprised because I --

4 THE WITNESS: But the whole --

5 MR. COOPER: Whoa, whoa, no,  
6 please don't talk. Please don't  
7 talk.

8 MR. FRYDMAN: No, but you  
9 mentioned something earlier.

10 MR. COOPER: If you have a  
11 question, ask the question.

12 MR. FRYDMAN: I do.

13 Q. You said that you no longer  
14 wished to participate in an enterprise  
15 where its CEO committed fraud on an ongoing  
16 basis.

17 A. I did say that.

18 Q. Yes. I would like to know what  
19 fraud the CEO committed.

20 MR. COOPER: We're not going  
21 there. I direct him not to answer.

22 MR. FRYDMAN: We are going  
23 there.

24 A. I will show --

25 Q. You are directed to answer



1 E. VERSCHLEISER

2 that.

3 MR. COOPER: No.

4 Q. You just made a statement which  
5 is disparaging on the record.

6 MR. COOPER: You don't get  
7 disparagement in a deposition.

8 Q. What fraud is it that you  
9 assert I commit?

10 MR. COOPER: You're not  
11 answering the question.

12 A. It's public document.

13 MR. COOPER: If you want it ask  
14 about defamation --

15 MR. FRYDMAN: Please mark it.

16 MR. COOPER: Mark it. Let's go  
17 back to the defamation. Is there  
18 anything else on it?

19 Q. Okay. Are you familiar with  
20 any companies that provide private browsing  
21 services so that one can browse privately  
22 or securely on the internet without leaving  
23 behind any search history, passwords, or  
24 user names?

25 A. I don't know anything technical

1 E. VERSCHLEISER

2 other than you can use a browser to look  
3 and browse the internet. Other than that,  
4 I don't have any other technical knowledge  
5 of browsing the internet.

6 Q. Are you familiar with any  
7 companies that provide private browsing  
8 services so that one can browse by  
9 encrypting his or her identity?

10 A. Please refer to my last answer.

11 Q. Are you familiar with what  
12 "setting up a proxy" means?

13 A. No, I'm not.

14 Q. Since December 3, 2013, have  
15 you set up any proxies on the United Realty  
16 exchange server?

17 MR. COOPER: Objection to form.

18 A. Please refer to my last answer.

19 Q. Since December 3, 2013, have  
20 you instructed or directed any other person  
21 to set up a proxy on the United Realty  
22 exchange server?

23 A. Please refer to my previous  
24 answer.

25 Q. Now, we asked you in discovery

1 E. VERSCHLEISER

2 to identify all the e-mail addresses that  
3 you used since December 1, 2013 and you  
4 initially identified Eli.V@MultiGroups,  
5 Eli.V@URPA.com, and Eli.V@Magenu.org.  
6 Since then you provided us with  
7 supplemental discovery requests that added  
8 Eli.V@multigroups.com, or continued it,  
9 added Eli.V@Multi-capital.com,  
10 HR@multigroups.com, press@multigroups.com,  
11 EliV@ATT.net, togoodtobefore@att.net,  
12 E-L-I-V-M-U-L-T-I@gmail.com, and  
13 E-L-I.V@ourplacenetwork.com.

14 A. That should be .org.

15 Q. I'm sorry, .org. Other than  
16 those, are there any other e-mails that you  
17 didn't provide us with and may now recall?

18 A. No.

19 Q. That's the exhaustive list of  
20 e-mails that you've used during that  
21 period?

22 A. I believe so.

23 Q. Did you ever use an e-mail  
24 E-L-I-V@UnitedRealty, one word, .com?

25 A. Please repeat that.

1 E. VERSCHLEISER

2 Q. E-L-I-V@unitedrealty.com.

3 A. Unfamiliar with it. I may  
4 have, but I'm unfamiliar with it.

5 Q. E-L-I.V1@unitedrealty.com?

6 A. I may have, but I'm not  
7 familiar with it.

8 Q. E-L-I.V@E-L-I-V.com?

9 A. Any e-mail address at  
10 E-L-I-V.com belongs to me. It's my private  
11 domain.

12 Q. So you have a private domain,  
13 E-L-I-V.com?

14 A. That's correct.

15 Q. But you did not disclose that  
16 before, right, you forgot?

17 A. If I didn't, then I probably  
18 forgot.

19 Q. How about  
20 E-L-I.V@unitedRBETA.com?

21 A. I'm not familiar with it.

22 Q. How about E-L-I.V@  
23 EL.hostpilot.com?

24 A. Not familiar with it.

25 Q. Are you familiar with an

1 E. VERSCHLEISER

2 address ELI.V@unitedrealty.com, one word  
3 for United Realty?

4 A. Not familiar with it.

5 Q. Are you familiar with  
6 ELI.V@sidebase.com?

7 A. Not familiar with it. I know  
8 what Side Base is, though.

9 Q. What is Side Base?

10 A. It's a data infrastructure, I  
11 believe, a data infrastructure technology  
12 company.

13 Q. I may have asked you this  
14 before, and if I did, I apologize, but I  
15 don't think I asked you specifically this:  
16 Did I ask you if you had been an  
17 administrator on any Intermedia domain for  
18 an exchange server?

19 MR. COOPER: If you know.

20 A. I don't know anything technical  
21 other than an e-mail exchange server sends  
22 and receives e-mails.

23 (Whereupon, Mr. Edelman  
24 returned to the deposition at 4:24  
25 p.m.)

1 E. VERSCHLEISER

2 Q. Okay, so we have finished with  
3 that technical line of questions.

4 Are you familiar with a company  
5 called Surf Easy?

6 A. I don't surf.

7 Q. Sorry?

8 A. I don't surf.

9 Q. You don't surf. You've never  
10 heard of a company named Surf Easy?

11 A. No. I may have, but not to my  
12 recollection.

13 Q. To your -- are you -- do you --  
14 did you ever use or purchase or subscribe  
15 for any services from a company called Surf  
16 Easy?

17 A. I don't surf, Jacob.

18 Q. I know you don't surf, Eli.

19 A. Okay.

20 Q. I'm still asking you the  
21 question.

22 A. Not to my recollection.

23 Q. Did you ask anyone acting on  
24 your behalf to purchase, use, or subscribe  
25 for any service or product from Surf Easy?

1 E. VERSCHLEISER

2 A. Not to my recollection.

3 Q. Are you familiar with a company  
4 called Virtual Internet?

5 A. Not to my knowledge.

6 Q. Or VI.com?

7 A. Not to my knowledge.

8 Q. Did you ever purchase, use, or  
9 subscribe any service or product offered by  
10 Virtual Internet or VI.com?

11 A. Not to my recollection.

12 Q. Did you ever ask anyone acting  
13 on your behalf to purchase, use, subscribe,  
14 or otherwise access services or products  
15 from Virtual Internet or VI.com?

16 A. Not to my recollection.

17 Q. Do you know a company called  
18 websitewelcome.com?

19 A. Not off the top of my head.

20 Q. Do you ever use, purchase, or  
21 subscribe for any services or products from  
22 websitewelcome.com?

23 A. Not to my recollection.

24 Q. Did you ask any person on your  
25 behalf to purchase, use, or subscribe to

1 E. VERSCHLEISER

2 any service or product from  
3 websitewelcome.com?

4 A. Not to my recollection.

5 Q. Since December 1, 2013, did you  
6 or anyone acting on your behalf use,  
7 purchase, or subscribe or otherwise obtain  
8 any services or product from Rex (phonetic)  
9 Based Hosting?

10 A. Not to my recollection.

11 Q. Since December 1, 2013, did you  
12 or anyone acting on your behalf purchase,  
13 use, subscribe, or otherwise obtain access  
14 to any service or product from Sign Designs  
15 Inc.?

16 A. Not to my knowledge.

17 Q. Since December 1, 2013, did you  
18 or anyone acting on your behalf purchase,  
19 use, subscribe, or otherwise obtain access  
20 no any service or product from Linode,  
21 L-I-N-O-D-E, a company in New Jersey?

22 MR. COOPER: L-I-N-D-O?

23 MR. FRYDMAN: L-I-N-O-D-E.

24 MR. COOPER: O-D-E.

25 Q. Mr. Verschleiser?



1 E. VERSCHLEISER

2 A. I'm just writing out my  
3 response because I'm going to need it  
4 repeated, I see, many times.

5 As a chairman of my company, I  
6 do not get involved in the day-to-day  
7 activities of technical or other type of  
8 day-to-day activities and, therefore, I  
9 would not know the answer to any of these  
10 questions.

11 Q. Okay. My questions aren't  
12 about any activities, they're about whether  
13 you --

14 A. Any of these specific types of  
15 activities.

16 Q. I'm only asking if you  
17 purchased, used, or subscribed or had  
18 anyone else on your behalf purchase, use,  
19 or subscribe products or services from, and  
20 so far I'm asked you about Surf Easy,  
21 Virtual Internet, websitewelcome.com, Rex  
22 Space Hosting, Sign Designs Inc., Linode.  
23 I'm now going to add a few more so we can  
24 do this in one shot: Digital Observation,  
25 Callow Crossing, Quadranet, Packnet,

1 E. VERSCHLEISER

2 Trusted Alias, Cybase, Cloud Fit, Cloud  
3 Flare, Chicago VPS.com; any of those  
4 companies, did you or anyone on your behalf  
5 since December 1, 2013 purchase, use, or  
6 subscribe for any of their services or  
7 products?

8 A. As the chairman of my company,  
9 I do not get involved in the day-to-day  
10 technical subscriptions or other type of  
11 accounts pertaining to any of these names  
12 that you've listed.

13 Q. Okay. Did you, not in any  
14 capacity other than you, Eli Verschleiser,  
15 did you ever purchase, use, or subscribe  
16 for any products or services from any of  
17 the 14 companies that we just talked about?

18 A. Not to my recollection.

19 Q. Do you know what a "native  
20 file" is?

21 A. No, I do not. Native file?

22 Q. Mmm-hmm.

23 A. No, I do not.

24 Q. At any time since December 3,  
25 2013, did you or anyone acting on your

1 E. VERSCHLEISER

2 behalf or at your direction create a  
3 distribution list on the United Realty  
4 e-mail server called Eli.V@multigroups.com?

5 A. I don't know anything technical  
6 other than --

7 I'm sorry, can you explain to  
8 me where a distribution list resides?

9 Q. On an e-mail exchange server.

10 A. I don't know anything technical  
11 other than an e-mail exchange server sends  
12 and receives e-mails.

13 Q. So I take it that you did not  
14 create a distribution list called  
15 Eli.V@multigroups.com?

16 A. You take a lot of things  
17 obviously not the way the rest of the world  
18 does, so --

19 Q. I'm asking you. I'm asking  
20 you, did you create a distribution list  
21 called Eli.V@multigroups.com? That's a yes  
22 or no.

23 A. I have no idea.

24 Q. You don't know if you did or  
25 not?

1 E. VERSCHLEISER

2 A. That's correct.

3 Q. You could have, it's completely  
4 possible?

5 MR. COOPER: Objection to form.

6 A. It's completely possible.

7 Q. Okay. How would it be  
8 possible?

9 A. If I go onto a computer and  
10 create it.

11 Q. Do you know how to do it?

12 A. Not -- I have no technical  
13 knowledge.

14 Q. So that's what I'm saying. Did  
15 you intentionally create a distribution --

16 A. I don't know what a  
17 distribution list is.

18 Q. Okay.

19 A. I can't do it intentionally or  
20 not intentionally done.

21 Q. So you couldn't have done it,  
22 right?

23 A. That's correct. I think we  
24 went through this like six times already.

25 MR. COOPER: We did.

1 E. VERSCHLEISER

2 Q. Did you create a distribution  
3 list or a distribution list user by the  
4 name of Ahuva.S@multigroups.com on the  
5 United Realty e-mail exchange server at any  
6 time after December 3, 2013?

7 A. Please refer to my last answer  
8 pertaining to e-mail exchange server.

9 MR. FRYDMAN: You know, I can't  
10 seem to get an answer out of his  
11 client.

12 MR. COOPER: You're asking him  
13 questions that he can't exactly  
14 answer.

15 MR. FRYDMAN: He can't answer  
16 whether he did something or not?

17 Q. Did you eat dinner last night?

18 MR. COOPER: Objection to form.

19 A. Yes, I did.

20 MR. COOPER: Don't answer.

21 Q. You did, great.

22 MR. COOPER: There's nothing  
23 technical about eating dinner.  
24 You're asking him technical questions  
25 that apparently neither of you really

1 E. VERSCHLEISER

2 understand and then you're asking him  
3 all sorts of questions around things  
4 that neither of you really  
5 understand.

6 THE WITNESS: Which you said so  
7 about ten minutes ago, so I'm glad  
8 you keep on asking things that you  
9 don't even know what it is.

10 Maybe tomorrow we'll ask all  
11 the questions back to him.

12 Q. Since December 3, 2013, did you  
13 use your e-mail account  
14 togoodtobefore@at&t.net?

15 A. I typically don't use it, so I  
16 don't recall.

17 Q. Did you use it at any time  
18 after December 3, 2013 to log on to the  
19 United Realty e-mail exchange server?

20 A. I typically don't use it, so I  
21 don't recall.

22 Q. Did you ever use it since  
23 December 3, 2013, to log in to my personal  
24 e-mail account on the United Realty e-mail  
25 exchange server?

1 E. VERSCHLEISER

2 A. Please refer to the last  
3 answer. It's the same.

4 Q. Did you ever use  
5 togoodtobefore@at&t to access or log in to  
6 your Multi Groups e-mail account on your  
7 Multi Groups e-mail exchange server?

8 A. I don't know how it's  
9 technically possible so I don't know how  
10 any of these questions actually function,  
11 but I typically don't use it so my answer  
12 remains the same as last answer.

13 Q. Did you ever use  
14 togoodtobefore@at&t.net to access e-mail  
15 accounts on the Magenu e-mail exchange  
16 server?

17 MR. COOPER: I don't know what  
18 this has to do with the defamation.  
19 We're not going just go through every  
20 possible contingency here. I mean,  
21 you've asked a ton of these questions  
22 already.

23 MR. FRYDMAN: I'm happy to move  
24 on.

25 MR. COOPER: Let's move on.

1 E. VERSCHLEISER

2 MR. FRYDMAN: I'm happy to move  
3 on.

4 MR. COOPER: We've been very  
5 patient. Let's move on.

6 MR. FRYDMAN: Okay.

7 Q. Other than you, is anyone else  
8 authorized to use togoodtobefore@at&t.net?

9 A. I don't know.

10 Q. You don't know whether you  
11 granted anyone else permission?

12 A. Correct.

13 Q. How would someone have  
14 permission to use it if you don't know?

15 A. If they set it up, I guess.

16 Q. No. If you -- it's yours,  
17 right? You own -- you own  
18 togoodtobefore@at&t.net; is that correct?

19 A. I don't know if I own it.

20 Q. You don't know if that's one of  
21 your e-mail accounts?

22 A. It's an e-mail account that  
23 I've used, I think, once in my life or  
24 maybe a couple times.

25 Q. When did you use it?



1 E. VERSCHLEISER

2 A. I don't recall the dates  
3 specifically.

4 Q. What do you use it for?

5 MR. COOPER: We're still doing  
6 the same thing. You have to have  
7 more pointed questions or we're not  
8 going to continue this. This is  
9 going on and on and on.

10 MR. FRYDMAN: You know what,  
11 can I see 161? That's fine. 161.  
12 Here, I got it.

13 Q. We've had a lot of testimony  
14 today about your not accessing and not  
15 knowing anything about these technical  
16 things, right?

17 MR. COOPER: Objection to form.

18 A. Yes.

19 MR. FRYDMAN: (Hanging.)

20 (Whereupon, the aforementioned  
21 e-mail dated December 4, 2013, was  
22 marked as E.V. Exhibit 19 for  
23 identification as of this date by the  
24 Reporter.)

25 Q. Mr. Verschleiser, handing what

1 E. VERSCHLEISER

2 you's been marked Exhibit 19 for  
3 identification, can you identify this?

4 A. Looks like an e-mail from Raul  
5 Del Forno to Eli Verschleiser.

6 Q. About what?

7 A. Says, "Eli, enable my account  
8 using Raul.D.CL." -- it's in English, so if  
9 you'd like to read it.

10 Q. Just explain it to me. What is  
11 this all about?

12 A. I don't know. It's an e-mail  
13 from Raul.

14 Q. You have no idea what this is  
15 about?

16 MR. COOPER: Objection to form.  
17 You have a specific question, ask it.

18 Q. Do you know what permissions  
19 Raul was talking about?

20 THE WITNESS: Can we take a  
21 two-minute break?

22 MR. COOPER: Sure.

23 MR. FRYDMAN: No, not now. Not  
24 while I'm asking on this exhibit.

25 MR. COOPER: You can take a

1 E. VERSCHLEISER

2 break after the question but you  
3 don't to have to finish the exhibit.

4 Re-read the question.

5 THE WITNESS: Repeat the  
6 question.

7 Q. Can you explain to me what Raul  
8 meant when he said to you, or what you  
9 understood him to mean when you asked him  
10 to enable his account by using his password  
11 and/or to fix the permissions to the  
12 following, what was he meaning?

13 A. You have to ask him. I don't  
14 know specifically here. Looks like he was  
15 asking me to enable his account, exactly  
16 what it says.

17 Q. Why would he do that?

18 MR. COOPER: Objection to form.

19 Q. Do you know?

20 A. Because he needed his account  
21 enabled.

22 Q. Why would you be the person to  
23 do that?

24 A. I don't know. You have to ask  
25 him.

1 E. VERSCHLEISER

2 Q. Well, let me show you another  
3 e-mail.

4 MR. COOPER: Do you want two  
5 minutes?

6 THE WITNESS: Yeah. I'm going  
7 to take a break.

8 THE VIDEOGRAPHER: We go off  
9 the record?

10 MR. FRYDMAN: Yeah, off the  
11 record.

12 THE VIDEOGRAPHER: We are now  
13 off the record at 4:37 p.m.

14 (Whereupon, a short recess was  
15 taken.)

16 THE VIDEOGRAPHER: We are now  
17 on the record at 4:42 p.m.

18 MR. FRYDMAN: See if you go  
19 through this and find the same one  
20 without the pictures because it has  
21 all, the one thing that leads up to  
22 it.

23 Q. All right. Earlier I asked you  
24 about blogs; do you recall that?

25 A. I do.

1 E. VERSCHLEISER .

2 Q. And I think you had said to me  
3 that you didn't know anything about blogs,  
4 right?

5 A. Vaguely.

6 Q. All right.

7 MR. FRYDMAN: Can you, I don't  
8 have copies of this. Can we make a  
9 few copies of this, then we'll come  
10 back to that.

11 Q. Do you, are you familiar with  
12 an e-mail address called  
13 webmaster@Magenu.org?

14 A. Not off the top of my head.

15 Q. Do you know someone named  
16 Andrew Skirowitz?

17 A. I know a Rabbi Skirowitz.

18 Q. Avram Skirowitz?

19 A. Yes.

20 Q. Do you know if you ever gave  
21 Rabbi Skirowitz an e-mail address on the  
22 United Realty e-mail exchange server?

23 A. An e-mail address on -- not to  
24 my recollection.

25 Q. Who is Rabbi Skirowitz?

1 E. VERSCHLEISER

2 A. Rabbi Skirowitz is Rabbi  
3 Skirowitz.

4 MR. COOPER: Okay, keep going.

5 Q. Do you know if he works for any  
6 of your organizations?

7 MR. COOPER: What's the  
8 difference?

9 MR. FRYDMAN: I'm inquiring.

10 MR. COOPER: No. We're not  
11 sitting here for two hours asking  
12 about Rabbi Skirowitz. I'm directing  
13 him not to answer that.

14 MR. FRYDMAN: You're directing  
15 him not to answer?

16 MR. COOPER: Yes, unless you  
17 can tell me how it's relevant because  
18 we've wasted a ton of time.

19 MR. FRYDMAN: I'll tell you how  
20 it's relevant, because Rabbi  
21 Skirowitz did the same thing you did  
22 here that they did to other people  
23 posting derogatory and defamatory and  
24 just --

25 MR. COOPER: Okay.

1 E. VERSCHLEISER

2 MR. FRYDMAN: -- and

3 disparaging blogs and e-mails on the  
4 internet and they're subject to, and  
5 Mr. Verschleiser is now involved in  
6 the matter of the petition to squash  
7 a subpoena duces tecum directed to  
8 Eli Verschleiser in connection with a  
9 case by Rabbi Steven Botkins against  
10 Rabbi Skirowitz where  
11 Mr. Verschleiser is being accused of  
12 doing --

13 THE WITNESS: This  
14 Mr. Verschleiser?

15 MR. FRYDMAN: -- exactly what  
16 he's done here.

17 THE WITNESS: That's this  
18 Mr. Verschleiser?

19 MR. COOPER: Ask him, then. Is  
20 it you?

21 THE WITNESS: I don't even know  
22 what he's talking about.

23 Q. You don't know what I'm talking  
24 about?

25 A. No, I don't.

1 E. VERSCHLEISER

2 Q. Okay, fine.

3 THE WITNESS: What does this  
4 have to do with that?

5 MR. COOPER: Okay, hold on.

6 MR. FRYDMAN: Can you mark  
7 this, please.

8 (Whereupon, the aforementioned  
9 two-page e-mail chain dated  
10 December 20, 2013, was marked as E.V.  
11 Exhibit 20 for identification as of  
12 this date by the Reporter.)

13 Q. Handing you what's been marked  
14 as Exhibit 20, can you identify it?

15 A. Looks like an e-mail.

16 Q. From whom to whom?

17 A. Looks like from DDH Rush.

18 Q. To?

19 A. Raul.D@URPA slash Eli  
20 Verschleiser slash Eli.V@URPA.

21 Q. Do you know who DDA rush is?

22 A. No, I do not.

23 Q. Did Raul Del Forno do any work  
24 for you with respect to anything after  
25 December 3, 2013, uh, 2013?



1 E. VERSCHLEISER

2 A. No, he did not.

3 Q. Do you have any idea what he's  
4 doing in this e-mail? What is this e-mail  
5 about; do you know?

6 A. You need to ask him.

7 Q. Do you know?

8 A. No, I do not.

9 Q. You have no idea what this is?

10 A. No, I do not.

11 MR. FRYDMAN: And -- and with  
12 can we mark --

13 This is already photocopied and  
14 marked, right? Do you -- do you --  
15 do we have -- that's not the one I  
16 want.

17 THE WITNESS: Are we finished  
18 with this one?

19 Q. Did you have Raul Del Forno set  
20 up the Multi Groups exchange, e-mail  
21 mailbox exchange server on intermedia.net  
22 after December 3, 2013?

23 A. I already answered. I have --  
24 I did not have Raul Del Forno do anything  
25 for me.

1 E. VERSCHLEISER

2 Q. And did you have Raul Del Forno  
3 deal with buying phones for your offices in  
4 Florida and on Nostrand Avenue after  
5 December 3, 2014 [sic]?

6 MR. COOPER: Objection to form.

7 A. Please refer to my last answer.

8 Q. Which is no, you did not?

9 A. Which is, again, I did not have  
10 Raul Del Forno do anything for me.

11 Q. Do you know a gentleman by the  
12 name of Jay Glatzer?

13 A. No, I do not.

14 Q. Do you know a company called  
15 Bug-Off Exterminating?

16 MR. COOPER: What's it called?

17 MR. FRYDMAN: Bug-Off, B-U-G  
18 hyphen O-F-F.

19 A. No, I do not.

20 Q. Do you have any business  
21 dealings with Mr. Glatzer or his company?

22 MR. COOPER: Do you know?

23 THE WITNESS: He just asked me  
24 if I knew him.

25 Q. I asked you if you knew Jay

1 E. VERSCHLEISER

2 Glatzer. Do you know any Mr. Glatzer?

3 A. I know Chaim Glanz.

4 MR. COOPER: No, that's a  
5 different name.

6 Q. Glatzer, G-L-A-T-Z-R.

7 MR. COOPER: E-R or Z-R?

8 MR. FRYDMAN: G-L-A-T-Z-E-R.

9 A. Not to my recollection.

10 Q. You never transacted any  
11 business with him?

12 A. I may have, but nothing  
13 substantial because he doesn't -- the name  
14 does not ring a bell.

15 Q. Did Magenu have an office on  
16 Nostrand Avenue?

17 A. Magenu does have an office on  
18 Nostrand Avenue.

19 Q. At what address on Nostrand  
20 Avenue?

21 A. I don't know it off the top of  
22 my head.

23 MR. FRYDMAN: What's the  
24 address, 22 -- you have it in there.

25 MR. EDELMAN: 2294.

1 E. VERSCHLEISER  
2 Q. 2294 Nostrand Avenue.  
3 A. I don't know it off the top of  
4 my head.  
5 Q. Have you ever been there?  
6 A. To Magenu's office?  
7 Q. Yeah.  
8 A. Probably twice.  
9 Q. Do you know anyone else on that  
10 same block?  
11 A. Anyone living there or --  
12 Q. Officing [sic] there.  
13 A. Not -- no.  
14 Q. No.  
15 A. I may, but not that I know of.  
16 Q. Do you know Elan Jaffe, Jaffa?  
17 A. Yeah, sure.  
18 Q. Do you know where Elan Jaffa  
19 offices?  
20 A. On Nostrand Avenue.  
21 Q. Do you know what address?  
22 A. Not specifically.  
23 Q. Okay, and you don't know  
24 Mr. Glatzer at 2392 Nostrand Avenue?  
25 A. Is that the same --

1 E. VERSCHLEISER

2 THE WITNESS: He said 22  
3 something, right? Is that --

4 MR. COOPER: You asked if he  
5 knew Glatzer, he said no, so let's  
6 move on.

7 Q. So you never had any  
8 discussions with Mr. Glatzer about me?

9 MR. COOPER: Why would you ask  
10 that question?

11 MR. FRYDMAN: I'm asking 'cause  
12 he says he didn't know him.

13 MR. COOPER: He says he doesn't  
14 know whether he knows him, it does  
15 not ring a bell. That's what he  
16 said.

17 MR. FRYDMAN: All right.

18 Q. Do you know Jeffrey L. Glatzer?

19 A. Same thing.

20 Q. Works at Reed Smith.

21 A. Do I?

22 Q. No, okay?

23 THE WITNESS: Do I know?

24 A. I may. I don't know. The name  
25 doesn't ring a bell.

1 E. VERSCHLEISER

2 Q. With respect to Alex Onica,  
3 have you ever had any discussions with  
4 Mr. Onica after December 3, 2013, about me?

5 A. I'm sure I did.

6 Q. Do you have any recollection  
7 what you said?

8 A. No, I do not.

9 MR. COOPER: You can ask him  
10 about defamation issues, not anything  
11 he's ever said about me.

12 MR. FRYDMAN: Okay.

13 Q. Did you ever say anything  
14 disparaging about me to Mr. Onica?

15 A. To mister?

16 Q. Onica.

17 A. Not to my recollection.

18 Q. Do you know Sarah Federman?

19 A. No, Sarah Federman, yeah.

20 Q. She works for Magenu. Do you  
21 know her?

22 A. Sarah Feder -- Sarah -- I know  
23 her under a different name, but yes.

24 Q. Have you ever had any  
25 communications that are, that meet the

1 E. VERSCHLEISER

2 definition of disparagement in our  
3 December 3rd agreement about me with  
4 Ms. Federman?

5 MR. COOPER: Objection to form.

6 A. I don't know what the  
7 definition of "disparagement" is in a legal  
8 form and way.

9 Q. Do you want me to read it to  
10 you?

11 A. No, it's okay.

12 MR. FRYDMAN: I'm gonna -- I'm  
13 gonna use that later.

14 Q. Do you know Mark Apel?

15 A. Who?

16 Q. Mark Apel.

17 A. Yes, I do.

18 Q. Who is he?

19 A. Mark Apel is Mark Apel.

20 Q. What's your relationship with  
21 him?

22 A. He's an investor of mine and he  
23 sits on a board of some organizations with  
24 me.

25 Q. Do you ever have any

1 E. VERSCHLEISER

2 conversations with Mr. Apel about me since  
3 December 3, 2013?

4 A. A lot.

5 Q. How many?

6 A. I have no idea. I don't count  
7 them.

8 Q. Do you know who Elan Jaffa is?

9 A. You asked me this before.

10 MR. COOPER: You asked him  
11 before.

12 Q. Oh, yeah, I'm sorry. Did you  
13 discuss with Mr. Jaffa bringing suit  
14 against me for alleged fraud and against  
15 members of the board of directors of United  
16 Realty Trust?

17 MR. COOPER: This, we're not  
18 going into this area. It's  
19 outside --

20 MR. FRYDMAN: Yes, we are.  
21 This is disparagement.

22 MR. COOPER: This is another  
23 area where you sought discovery and  
24 you were told you could not.

25 MR. FRYDMAN: This is -- I'm



1 E. VERSCHLEISER

2 absolutely taking this over your  
3 objection.

4 Q. Did you have any conversations  
5 with Mr. Jaffa where you asserted that I  
6 committed fraud or -- or -- or acted  
7 inappropriately with the books and records  
8 of United Realty Trust?

9 MR. COOPER: Objection to form.  
10 You can answer that narrow question.

11 A. Not to my recollection.

12 Q. You may have?

13 MR. COOPER: Objection to form.

14 A. Not to my recollection.

15 Q. Do you know Benjamin Fishoff?

16 A. Yes, I do.

17 Q. Did you ever have any  
18 discussions with Mr. Fishoff about me since  
19 December 3, 2013?

20 A. Many times.

21 Q. Did you ever suggest to  
22 Mr. Fishoff that he should hire a lawyer to  
23 sue me and to sue United Realty Trust board  
24 of directors?

25 MR. COOPER: Objection to form.

1 E. VERSCHLEISER

2 You don't have to answer that  
3 question.

4 If you want to ask him if he  
5 disparaged, but we're not getting  
6 into lawsuits.

7 MR. FRYDMAN: I'm asking him --

8 MR. COOPER: I heard what you  
9 asked him.

10 MR. FRYDMAN: And I'm entitled  
11 to ask him.

12 MR. COOPER: No.

13 MR. FRYDMAN: That is  
14 disparagement, by the way.

15 MR. COOPER: Okay.

16 Q. And did you suggest that he has  
17 a basis to hire a lawyer to sue me for  
18 fraud in connection with the financials of  
19 United Realty Trust?

20 MR. COOPER: Okay. That's  
21 outside the scope. You don't have to  
22 answer it. Next question.

23 MR. FRYDMAN: That is -- that  
24 is disparagement on its face.

25 MR. COOPER: I haven't seen it

1 E. VERSCHLEISER

2 anywhere in any of your papers.

3 MR. FRYDMAN: Okay, the  
4 discovery is not about what I already  
5 know. Discovery is about what I get  
6 to learn.

7 MR. COOPER: Mmm-hmm.

8 MR. FRYDMAN: You're not going  
9 answer that question?

10 MR. COOPER: No, because you  
11 already asked the judge if you can  
12 ask about supposed --

13 MR. FRYDMAN: That's not  
14 correct.

15 MR. COOPER: -- plans to sue  
16 you and she said it's outside the  
17 scope.

18 MR. FRYDMAN: That's not  
19 correct.

20 MR. COOPER: Okay.

21 Q. Did you tell Mr. Jaffa or  
22 Ms. Kirschenbaum or Mr. Fishoff that I took  
23 money inappropriately from United Realty  
24 Trust?

25 MR. COOPER: Objection to form.

1 E. VERSCHLEISER

2 You can answer that narrow question.

3 A. Not to my recollection.

4 Q. You could have?

5 MR. COOPER: That's not what he  
6 said and --

7 Q. I need you to say yes or no.

8 MR. COOPER: -- he doesn't  
9 recall.

10 MR. FRYDMAN: If he doesn't  
11 recall then he could have; is that  
12 right?

13 MR. COOPER: I don't think  
14 could have --

15 Q. So Mr. Verschleiser --

16 MR. COOPER: The sun, the  
17 moon --

18 Q. Could you have -- could you  
19 have said to Mr. Fishoff to  
20 Ms. Kirschenbaum and to Mr. Jaffa that I  
21 stole money from United Realty Trust?

22 MR. COOPER: Could you do  
23 something is an inappropriate  
24 question. You do not have to answer  
25 that because anything is possible,

1 E. VERSCHLEISER

2 Mr. Frydman, absolutely anything.

3 Q. Did you --

4 MR. COOPER: You asked him that  
5 question. You may not like the  
6 answer, but you asked him that  
7 question.

8 MR. FRYDMAN: Doesn't recall.

9 Q. Well, if Mr. Fishoff and  
10 Ms. Kirschenbaum and Mr. Jaffa hired a law  
11 firm to assert those allegations, do you  
12 have any idea where they would have gotten  
13 that idea from?

14 MR. COOPER: Objection. You  
15 don't have to answer that question.

16 A. You would have to ask them.

17 Q. I fully intend to.

18 Are you familiar with the law  
19 firm of Clancy, Binko, and Goldberg?

20 MR. COOPER: What does that  
21 have to do with the defamation?

22 MR. FRYDMAN: It will establish  
23 the defamation. I have a letter from  
24 them that establishes what they were  
25 told.

1 E. VERSCHLEISER

2 MR. COOPER: Let me see the  
3 letter. Have you produced it?

4 MR. FRYDMAN: I haven't.

5 MR. COOPER: Okay. We're not  
6 going into this.

7 MR. FRYDMAN: I'm not going  
8 into it, I'm asking him a question.

9 MR. COOPER: Good.

10 MR. FRYDMAN: Does he know that  
11 law firm?

12 MR. COOPER: Do you know that  
13 law firm?

14 THE WITNESS: No, I don't, no.

15 MR. COOPER: Okay. End of it.

16 Q. Do you know a lawyer named  
17 Louis Bariarki?

18 A. No, I did not.

19 Q. Do you know Jack Rosen?

20 A. Yes, I do.

21 Q. Did you ever have any  
22 conversations with Mr. Rosen about me?

23 A. Many.

24 Q. Did you tell Mr. Rosen that I  
25 have done inappropriate things with respect

1 E. VERSCHLEISER

2 to our business dealings?

3 A. Not to my recollection.

4 Q. But you're unable to say that  
5 you did not?

6 MR. COOPER: You keep doing the  
7 same thing. That's his answer.

8 Q. Do you know Yanki Saks?

9 A. Yes, I do, very well.

10 Q. Have you had any conversations  
11 with Yanki Saks since December 3, 2013,  
12 about me?

13 A. Many.

14 Q. Did you say anything to  
15 Mr. Saks that would involve a suggestion  
16 that I have committed fraud, acted  
17 inappropriately, took money from the  
18 company, or did anything else that you  
19 think is wrong?

20 MR. COOPER: Objection to form.

21 A. Not to my recollection.

22 Q. Do you know Morty Davis?

23 A. Who?

24 Q. Morty Davis.

25 A. Yes, I do.

1 E. VERSCHLEISER

2 Q. Ever have any conversations  
3 since December 1st -- I'm sorry, since  
4 December 3, 2013, have you had any  
5 conversations with Morty Davis about me?

6 A. Many.

7 Q. In any of those conversations,  
8 did you assert that I inappropriately took  
9 any monies from any companies or did  
10 anything else that was not a hundred  
11 percent appropriate?

12 MR. COOPER: Objection to form.

13 A. Not to my recollection.

14 Q. Do you know Ellis Murski?

15 A. Yes, I do.

16 Q. Who is Ellis Murski?

17 A. Ellis Murski is Ellis Murski.

18 Q. Do you know what he does for a  
19 living?

20 A. I know he's an attorney.

21 Q. Do you know who he represents?  
22 Do you know if he represents Dr. Alexandro?

23 A. Not specifically.

24 Q. You don't know if he represents  
25 Dr. Alexandro?



1 E. VERSCHLEISER

2 A. I do not specifically know if  
3 he represents Dr. Alexandro.

4 Q. Has he ever represented to you  
5 that he represents Dr. Alexandro?

6 A. Not to my recollection.

7 Q. Did you have any conversations  
8 with Mr. Murski and Dr. Alexandro asking  
9 them to please initiate a lawsuit against  
10 me?

11 MR. COOPER: You don't have to  
12 answer that question.

13 Q. Yes, you do.

14 A. I'm going to listen to my  
15 attorney.

16 Q. Did you have any conversations  
17 with Mr. Murski or with Miss, Dr. Alexandro  
18 about me since December 3, 2013?

19 A. Many.

20 Q. In any of those conversations,  
21 did you suggest that I acted in any way  
22 inappropriately?

23 A. Not to my recollection.

24 Q. Do you know Allan Stahler?

25 MR. COOPER: What's the last

1 E. VERSCHLEISER

2 name?

3 MR. FRYDMAN: S-T-A-H-L-E-R.

4 A. From the Stahler Organization?  
5 Can you repeat the name?

6 Q. Allen Stahler.

7 A. Yes, I do.

8 Q. Glad that you recalled, and --  
9 and have you had any conversations with  
10 Mr. Stahler since December 3, 2013, about  
11 me?

12 A. Yes. The last one was about 15  
13 minutes ago.

14 Q. Okay. In any of those, did you  
15 say anything that suggested that I acted in  
16 any way inappropriately?

17 A. Not to my recollection.

18 Q. Do you know Shaul Greenwald?

19 A. The name rings a bell but  
20 not -- vaguely. Shaul -- what -- where  
21 does he work?

22 Q. Yep. Did you have any  
23 conversations with Mr. Greenwald about me  
24 since December 3, 2013?

25 A. Not to my recollection.

1 E. VERSCHLEISER

2 Q. Do you know Joel Zeigelbaum?

3 A. Yes, I do.

4 Q. Do you have any conversations  
5 with Mr. Zeigelbaum since December 3, 2013,  
6 about me?

7 A. Many.

8 Q. In any of those conversations,  
9 did you suggest that I did anything  
10 inappropriate?

11 A. Not to my recollection.

12 Q. Do you know Steven Vay?

13 A. Yes, I do.

14 Q. Did you have any conversations  
15 with Steven Vay since December 3, 2013,  
16 about me?

17 A. Many.

18 Q. In any of those conversations,  
19 did you say to Mr. Vay that I did anything  
20 inappropriate?

21 A. Not to my recollection.

22 Q. Do you know your cousin  
23 Eli Verschleiser?

24 A. I have many cousins  
25 Eli Verschleiser.

1 E. VERSCHLEISER

2 Q. Do you know your cousin  
3 Eli Verschleiser that invested in United  
4 Realty Advisors?

5 A. Sure.

6 Q. Since December 3, 2013, did you  
7 ever have any conversations with  
8 Eli Verschleiser, your cousin, about me?

9 A. Many.

10 Q. In any of those conversations,  
11 did you suggest that I did anything  
12 inappropriate?

13 A. All the people that I had many  
14 conversations with that you asked me about  
15 you, I always tell them to call you and to  
16 talk to you directly so --

17 Q. My question is --

18 A. -- so the answer is the same as  
19 the last one.

20 Q. So did you say anything --

21 A. Not to my recollection.

22 Q. -- to them that I acted  
23 inappropriately?

24 A. Not to my recollection.

25 Q. Did you ever say anything to

1 E. VERSCHLEISER

2 anyone about me that caused your cousin to  
3 become concerned about his investments at  
4 United Realty?

5 A. I have no idea. How am I  
6 supposed to know?

7 Q. Did you ever get an e-mail from  
8 your cousin suggesting that something you  
9 said to the press has caused him  
10 nervousness?

11 A. Said to the press? Not -- I  
12 don't -- not to my recollection, and I  
13 don't talk to the press.

14 Q. Do you write to the press?

15 A. Do I write to the press? You  
16 have to define what the "press" is more for  
17 me to answer that question.

18 MR. COOPER: He told you  
19 earlier he submits articles.

20 Q. You don't write to the press,  
21 right; isn't that what you said?

22 MR. COOPER: You see.

23 A. I'm sorry.

24 MR. FRYDMAN: Can you please  
25 mark this.

1 E. VERSCHLEISER

2 (Whereupon, the aforementioned  
3 four-page "Real Deal" article was  
4 marked as E.V. Exhibit 21 for  
5 identification as of this date by the  
6 Reporter.)

7 Q. At any time after December 13,  
8 2013 did you write to any media  
9 organization asserting that --

10 MR. COOPER: Does he have the  
11 exhibit?

12 MR. FRYDMAN: No, I didn't give  
13 him anything yet.

14 MR. COOPER: Because you gave  
15 it to me.

16 Q. Did you, at any time after  
17 December 13, 2013, write to any media  
18 outlet that, I quote, I don't quote yet,  
19 that you resigned as president and  
20 treasurer of United Realty Trust, now I'm  
21 quoting, "due to the fraud and actions of  
22 my ex-partner Mr. Jacob Frydman"?

23 A. Not to my recollection.

24 Q. Handing you what's been marked  
25 as Exhibit 21 for identification. See the

1 E. VERSCHLEISER

2 highlighted portion that says:

3 "In a written statement to 'The  
4 Real Deal,' Verschleiser noted," and  
5 I quote, "he lost in court and the  
6 judge did not award him the  
7 injunction. I ultimately decided to  
8 resign as the president and treasurer  
9 of United Realty Trust due to the  
10 fraud and actions of my ex-partner,  
11 Mr. Jacob Frydman, as outlined in my,  
12 the lawsuits against him."

13 A. I see it.

14 Q. Did you write that?

15 MR. COOPER: Objection to form.

16 A. It looks like "The Real Deal"  
17 wrote this.

18 Q. Did you write "The Real Deal" a  
19 letter or an e-mail stating that; did you  
20 write a quote, written statement to "The  
21 Real Deal"?

22 A. Not to my recollection.

23 Q. Do you notice that "The Real  
24 Deal" says that you did?

25 A. I noticed a lot of things in

1 E. VERSCHLEISER  
2 the media today about Israel and Gaza, too,  
3 that are not true, so I see that all day  
4 long.

5 MR. FRYDMAN: Where's 167?

6 MR. EDELMAN: (Hanging.)

7 MR. FRYDMAN: (Hanging.)

8 (Whereupon, the aforementioned  
9 two-page e-mail dated December 20,  
10 2013, was marked as E.V. Exhibit 22  
11 for identification as of this date by  
12 the Reporter.)

13 Q. Handing you what's been marked  
14 as Exhibit E.V. 22 for identification, can  
15 you identify that, please?

16 A. It looks like an e-mail.

17 Q. From?

18 A. Eliversch@AOL.com.

19 Q. Do you know who that is?

20 A. I'm assuming it's -- it could  
21 be -- well, it's not my e-mail address so  
22 it must be from another Eli Versch or  
23 Eli Verschleiser, but I not going to  
24 assume. I don't know.

25 Q. You don't know if this came



1 E. VERSCHLEISER

2 from your cousin Eli Verschleiser?

3 A. Not off the top of my head.

4 Q. Well, by reading it, can you  
5 tell?

6 A. "Who is Shmay Yorten" -- yes,  
7 looks like it did come from him.

8 Q. It did, and what was, what was  
9 the subject?

10 A. I cannot be certain, but you  
11 would have to ask him.

12 Q. Right. What was the subject?

13 A. "'The Real Deal'  
14 Eli Verschleiser."

15 Q. And what did Mr. Verschleiser,  
16 your cousin, tell you after reading "The  
17 Real Deal" article?

18 MR. COOPER: He started to read  
19 the e-mail to you. Is that what  
20 you're asking him?

21 MR. FRYDMAN: Yeah.

22 MR. COOPER: It says what it  
23 says. Do you have any other  
24 questions? It says what it says.

25 Q. What did you understand that to

1 E. VERSCHLEISER

2 mean?

3 MR. COOPER: Objection to form.

4 A. Exactly what it says. It asks  
5 who somebody is and it asks what's going on  
6 and it says that he's getting nervous he  
7 put in a million dollars and --

8 Q. Do you have any sense --

9 A. -- that's a lot of money.

10 Q. -- why he's getting nervous and  
11 what that has to do with "The Real Deal"?

12 A. "The Real Deal" article that  
13 you showed me as Exhibit 21?

14 Q. Right.

15 A. Oh, or "The Real Deal" thing --  
16 or this on the back here?

17 Q. I'm asking you what your  
18 understanding is.

19 A. Of what?

20 Q. Of what he meant by him saying,  
21 "I'm getting nervous."

22 MR. COOPER: Do you know what  
23 that means when he says, "I'm getting  
24 nervous"?

25 THE WITNESS: Yeah, he's

1 E. VERSCHLEISER

2 getting nervous.

3 MR. COOPER: Okay. That's the  
4 answer.

5 MR. FRYDMAN: You don't have to  
6 ask him. That's fine.

7 Q. Do you know John Kastamides?

8 A. Of course.

9 Q. Did you have any conversations  
10 with him about me since December 1st --  
11 3rd, 2013?

12 A. Many.

13 Q. In any of those conversations,  
14 did you assert that I did anything  
15 inappropriate?

16 A. Not to my recollection.

17 Q. Do you know Abe Lesser?

18 A. Yes.

19 Q. Did you have any conversations  
20 with Abe Lesser about me since December 3,  
21 2013?

22 A. Many.

23 Q. In any of those conversations,  
24 did you assert that I did anything  
25 inappropriate?

1 E. VERSCHLEISER

2 A. Not to my recollection.

3 Q. Do you know Piny Rand?

4 A. Who?

5 Q. Piny Rand.

6 A. Yes. He's an investor in our  
7 company.

8 Q. Did you have any conversations  
9 with Piny Rand since December 3, 2013,  
10 about me?

11 A. Many.

12 Q. In any of those conversations,  
13 did you assert that I did anything  
14 inappropriate?

15 A. Not to my recollection.

16 Q. Do you know Mayer Nebibzal?

17 A. Yes, I do.

18 Q. Is he your accountant?

19 A. He's one of my accountants.

20 Q. Did you ever have any  
21 discussions with him since December 3,  
22 2013, about me?

23 A. Many.

24 Q. In any of those conversations,  
25 did you assert that I did anything

1 E. VERSCHLEISER

2 inappropriate?

3 A. Not to my recollection.

4 Q. Do you know Sammy Trencher?

5 A. Yes, I do.

6 Q. Since December 3rd of 2013, did  
7 you have any conversations with Sammy  
8 Trencher about me?

9 A. I don't recall.

10 Q. So I presume you don't recall  
11 whether you said anything disparaging about  
12 me or not?

13 A. I don't recall if I had any  
14 conversations with him.

15 Q. Do you know Susan Mann?

16 A. Not off the top of my head.

17 Q. Do you know Mayer Gross?

18 A. Not off the top of my head.

19 Q. Do you know Shehan Lefcowitz?

20 A. Sure.

21 Q. Did you have any conversations  
22 with Shehan Lefcowitz about me since  
23 December 3, 2013?

24 A. I don't recall having any.

25 Q. Do you know Chaim Forte,

1 E. VERSCHLEISER

2 Fortgang?

3 A. Sure.

4 Q. Did you have any conversations  
5 with him about me since December 3, 2013?

6 A. I may have.

7 Q. Did you say anything  
8 disparaging in any of those conversations?

9 A. Not to my recollection.

10 Q. How about Naftali Soloman?

11 A. Doesn't ring a bell, the name.

12 Q. How about Jeffrey Zoldan?

13 MR. COOPER: What's the last  
14 name?

15 MR. FRYDMAN: His wife's last  
16 name.

17 MR. COOPER: What, what's the  
18 last name that you just said?

19 MR. FRYDMAN: Z-O-L-D-A-N.

20 A. I don't know.

21 Q. You don't know Jeffrey Zoldan?

22 A. I may by a different name,  
23 but --

24 Q. Well, what name might you know  
25 him by?